REMARKS

This Response, submitted in reply to the Office Action dated March 18, 2010, is believed

to be fully responsive to each point of rejection raised therein. Accordingly, favorable

reconsideration on the merits is respectfully requested.

Claims 1-19 are all the claims pending in the application.

I.   Rejection of claims 15-18 under 35 U.S.C. § 102

Claims 15-18 are rejected under 35 U.S.C. § 102(b) as being anticipated by Coss et al.

(Coss hereinafter) (US Patent No. 6,170,012 B1).

Claim 15

Claim 15 recites, *inter alia,:*

> "**a management module coupled to said network data
> processing module, said management module comprising a
> first memory containing a first table,** said first table
> containing primary identifiers associated with at least one
> parameterized rule for providing direction to said network
> data processing module when one or more of said primary
> identifiers and said at least one parameterized rule are
> associated with at least one parameter value

The Examiner asserts that Fig. 3 and column 3, line 4 and lines 66-67 teaches the claimed

first memory containing a first table. However, there is no teaching or suggestion of <u>a</u>

<u>management module coupled to the network data processing module</u> (firewall as asserted by the

Examiner) comprising the first memory containing a first table. Coss discloses that the security

policies can be represented by sets of access rules which are represented in tabular form and

which are loaded into the firewall by a firewall administrator.

Therefore, Coss does not appear to teach or suggest the claimed management module

coupled to the network data processing module.

In response to Applicant's arguments, on page 15 of the Office Action, the Examiner

merely reiterates the language of the Examiner's previous rejection and again cites cols. 3 and 4

and lines 66-67 and 1 in support.

In rejecting claim 15, the Examiner asserts that the firewall of Coss teaches the claimed

network data processing module. See page 2 of Office Action. However, it is unclear where

Coss discloses the claimed management module coupled to the network data processing module.

The Examiner asserts that the claimed management module is disclosed in cols. 3 and 4 and lines

66-67 and 1.

However, this aspect of Coss cited by the Examiner describes:

> The security policies can be represented by sets of
> access rules which are represented in tabular form and
> which are loaded into the firewall by a firewall
> administrator. As illustrated in FIG. 3, such a table can
> provide for categories including rule number, designations
> of source and destination hosts, a designation of a special
> service which can be called for in a packet, and a
> specification of an action to be taken on a packet. Special
> services can include proxy services, network address
> translation, and encryption, for example.

However, this describes the security policies are loaded into a firewall (which the

Examiner asserts teaches a network data processing module) by an administrator. Therefore, the

firewall of Coss could not also teach the management module coupled to the network data

processing module. Specifically, based on the Examiner's reasoning, the firewall would be

coupled to itself, thereby evidencing the deficiency in the Examiner's rejection.

Claim 15 recites, *inter alia*, "wherein said at least one primary metarule is specified

according to a string of characters containing a place-holder for each parameter of said primary

metarule that is not statically defined, <u>wherein the place-holder is relevant to the rule</u>."

Coss only teaches the use of a "wild card" place-holder that represents "when a category

provided for in the rule table **is irrelevant in a certain rule**." Coss*, col. 4, lines 15-21. In

contrast, the place-holder "$1" described in the Specification at p. 15, line 34 - p. 16, line 2,

clearly represents the source or destination in the embodied rule prototypes, and the place-holder

has definite relevance, as it corresponds to the ISP address of the e-mail server on the LAN.

In reply to Applicant's arguments, on pages 15-16 of the Office Action, the Examiner

cites col. 4, lines 15-21 in support of the Examiner's rejection.   However, as discussed above,

this is explicitly contrary to the recitations of claim 1. Specifically, the wild card place holder of

Coss applies when a category provided for in the rule table **is irrelevant in a certain rule**,

whereas the claimed limitation recites that **the place-holder is relevant to the rule.**

Also, on page 16 of the Office Action, the Examiner asserts that an embodiment of the

invention discloses that the place-holder corresponds to an ISP address, and therefore, the

Examiner interprets that place-holder as corresponding to the ISP address. Applicant notes that

the Examiner should not unduly narrow the scope of the claims and the claims should be

interpreted based on the actual claim language.   Further, as the wild card "*"of Coss is provided

for categories which are irrelevant to the rule, the DEST HOST of rule 20 as shown in Fig. 3 is

irrelevant to rule 20.   Consequently, the DEST HOST represented by an "*" in rule 20 is not

relevant to the rule.

The Applicant thus submits that Coss fails to teach each and every element of claim 15,

therefore, claim 15 and dependent claim 16 should be deemed allowable.

To the extent independent claims 17 and 18 recite similar subject matter, claims 17 and

18 should be deemed allowable for at least the same reasons.

Claim 16

Claim 16 recites "said management module further comprising a second memory

containing a second table, said second table containing secondary identifiers associated with at

least one of said primary identifiers and one or more respective parameter values."

The Examiner asserts that Figs. 3 and 4 and column 5, lines 51-57 teaches the elements of

claim 16. The aspects of Coss cited by the Examiner describe a rule table (Fig. 3) and a cache

(Fig. 4).   Further, Coss discloses that as the number of cache entries can grow to many times the

number of rules, efficient use of a cache may require indexing.

However, contrary to the Examiner's assertions, there is no teaching or suggestion of the

claimed management module, or that the management module comprises a second memory

containing a second table as claimed.

Therefore, claim 16 and should further be deemed allowable.

II.   Rejection of claims 1-14 and 19 under 35 U.S.C. § 103

Claims 1-14, and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over

Coss et al. (Coss hereinafter) (US Patent No. 6,170,012 B1) in view of Bellinger et al. (Bellinger

hereinafter) (US 2002/0169858).

To the extent independent claims 1 and 9 recite subject matter similar to independent

claims 15, 17 and 18 as discussed above, Applicant submits that independent claims 1 and 9 and

their dependent claims should be deemed allowable for at least the same reasons. Moreover,

Bellinger does not cure the deficiencies of Coss.

Claim 1 recites "a first table storing sets of at least <u>one primary rule</u>, called "primary

metarules," <u>in a parameterizable form </u>and in <u>corresponding relationship to primary identifiers</u>."

See for example, page 16, lines 5-9 of the Applicant's originally filed specification.

The Examiner asserts that column 4, lines 1-6 teaches this aspect of the claim. Coss

discloses that security policy rules can be represented by sets of access rules which are

represented in tabular form and are loaded into a firewall. The table can provide for categories

including rule numbers, designations of source and destination hosts, a designation of a special

service and a specification of an action to be taken on a packet.

However, Coss does not teach or suggest that the table stores sets of at least <u>one primary</u>

<u>rule</u>, called "primary metarules," <u>in a parameterizable form </u>and in <u>corresponding relationship to</u>

<u>primary identifiers</u>, as claimed.   Specifically, the rules of Coss do not appear to be in

parameterizable form.

Claim 1 further recites:

> "management means which is coupled to control means of
> said data processing server and, on receipt of auxiliary
> data representing operating parameters that request
> reconfiguration of the control means, the auxiliary data
> delivered by said control means after reception by the data
> processing server of secondary data that requires
> reconfiguration of the control means, selects at least one
> of the primary identifiers in the first table and
> associates said auxiliary data therewith so as to define
> dedicated processes of said control means"

The Examiner asserts that column 4, lines 3-6 and column 5, lines 35-46 teach this aspect

of the claim. Coss discloses a table can provide for categories including rule numbers,

designations of source and destination hosts, a designation of a special service and a

specification of an action to be taken on a packet. Further, Coss discloses that stateful packet

filtering may be implemented by caching rule processing results.   However, Coss does not teach

at least the interrelationship between the management means, controls means, data processing

server, auxiliary data and secondary data, as claimed.

The Examiner states that Coss does not disclose "on receipt of auxiliary data representing

operating parameters that request reconfiguration of the control means," and cites Bellinger,

paragraph [0077], to cure the deficiency.

However, Bellinger does not cure the deficiencies of Coss disclosed above. Further,

Bellinger discloses:

> Each service request, for both registration and
> activation, is sent via XML from the Service Provider's
> portal server to the central controller. The controller
> interprets the request by passing the service parameters
> through the pre-defined rules associated with the Service

> Offering and stored in the LDAP directory. <u>These rules</u>
> <u>could be as simple as sending a configuration request to a</u>
> <u>Firewall to allow or deny access to specific ports,</u> or it
> could be more complex as in the case of an Application
> Service where the central authority may have to pass access
> information to the application server, set up a VPN between
> the user and application server, punch through a firewall
> and modify the available bandwidth and QoS to the user.

However, contrary to the Examiner's assertions, there is no teaching or suggestion that

on receipt of <u>auxiliary data representing operating parameters that request</u> **<u>reconfiguration of</u>**

<u>the control means</u>, as claimed.

For at least the above reasons, claim 1 and its dependent claims should be deemed

allowable.

To the extent independent claim 9 recite similar subject matter, independent claim 9 and

its dependent claims should be deemed allowable for at least the same reasons.

Claim 19

Claim 19 recites, *inter alia*, "wherein the primary metarule comprises one of definitions

and prototypes of sets of the least one primary rule." Applicant refers the Examiner to, for

example, page 11, lines 5-25 of the specification for further clarification.

Applicant submits that the art cited by the Examiner does not teach this aspect of the

claim. Therefore, claim 19 should be deemed allowable.

III.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

/Ruthleen E. Uy/

SUGHRUE MION, PLLC   Ruthleen E. Uy
Telephone: (202) 293-7060   Registration No. 51,361
Facsimile: (202) 293-7860

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CUSTOMER NUMBER

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